



FAQs Regarding Dependent Verification Data Security

The City is initiating dependent eligibility verification to ensure that the City's benefit dollars are used appropriately. This process also will help us make sure we are operating our benefit program in accordance with federal tax law and industry practices, using taxpayer and ratepayer dollars wisely, and treating all employees consistently and fairly. That said, we want to continue the coverage of all dependents that meet our eligibility criteria and commit to getting you any assistance you need to confirm the eligibility of your dependents and to keep them on your coverages.

Our primary considerations in designing the process were maintaining data security, and providing outreach and other support services for our employees. This set of FAQs addresses security of your data.

How do I know Aon Hewitt will keep my personal information secure?

Data security was a primary concern when the City selected a firm to provide dependent verification services. The City's Office of Information Security, working with the Benefits Unit of the Personnel/Human Resources Department and the Department of Finance and Administrative Services' Contracting group, performed an exhaustive evaluation of potential vendor. They endorsed Aon Hewitt's industry-leading standard for maintaining the privacy and security of individual data. With their internal controls, policies, processes, and experience handling this kind of information, the City has great confidence in Aon Hewitt's ability to maintain the safety of City employees' personal data.

Aon Hewitt has strict policy guidelines including:

- document access logs,
- secured physical storage facility with multiple lock access requirements,
- secured server facility,
- employee background checks,
- advanced encryption techniques, including encryption of all passwords and strict requirements around password length and complexity,
- employee access on a need-to-know basis only.

Aon Hewitt highlights their digital systems and related security as key differentiators from their competitors. City Information Security staff determined that "employee data is safer with Aon Hewitt than with many commercial vendors".

How does Aon Hewitt protect our data from malicious infections?

Protection from external harm is just as important as internal safety. Aon Hewitt uses an industry grade anti-virus server and software products to perform daily and on-demand monitoring of worms and viruses. Virus definitions are updated daily and all files and emails are re-scanned weekly. Spyware products are used to protect web users from spam and spyware after login.

How do I know Aon Hewitt won't sell my data?

Aon Hewitt will not sell your data to anyone. Under the City's contract and their own Security and Privacy policy, Aon Hewitt agrees they will not sell, trade or disclose to third parties any individually identifiable information derived from eligibility verification, except as required by law.

If there is a breach, how will I be protected?

Even with vigilance and strong controls in place, data breaches are possible. Aon Hewitt will, in the event of a security breach which results or could result in the release of personal data, communicate promptly with the City and affected City employees, and provide credit monitoring services for one year.

Once all current employees are verified this summer, then what? Will dependent verification be required of new hires, when a current employee has a life event - like marriage, a new domestic partnership, or birth of a child – and for Open Enrollment additions?

Aon Hewitt will continue to handle the document review and eligibility determination for the City in the future. This initial dependent verification process is for employees covering dependents on City benefits as of May 19. In October, the verification process will be required of all new hires and all dependents added after mid-May.

Why is the City having an outside organization gather these documents instead of City HR staff?

When we started exploring the dependent verification concept, it became clear that the process could not be performed with the City staff and systems currently in place. The City would have needed to create a more secure data center, a special web interface, and a customer service unit to handle the documents and questions related to over 16,000 dependents. As we analyzed the options further:

- Market research indicated that a number of independent firms have made the dependent verification process a key part of their business. Their fees to the City are far below the cost of creating the structure internally.
- Review of the experience of other large employers pointed to the common practice of using an outside vendor to manage the process.

- Exploratory conversations with a number of employees and union representatives indicated that many preferred that the City NOT have access to additional personal information. The City will not see your documents unless we are asked to address an appeal of Aon Hewitt's decision. In the majority of cases, all we will know is which dependents have been confirmed for future coverage.

As a result, the Personnel/Human Resources Department decided to have dependent verification performed by an outside firm. Our primary selection criteria were the ability to maintain data security, and the ability to provide outreach and other support services for our employees. The City wants to ensure that all dependents eligible for our benefit programs can stay on them and that employees will have the support they need to secure and submit the necessary documents to do so. In this competitive bid process, Aon Hewitt was the clear leader in both these areas.

For additional information, see [Aon Hewitt's Security and Privacy Policy](#).

Updated June 20, 2014